

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

MCHENRY COUNTY and KANKAKEE)	
COUNTY, bodies politic and corporate,)	
)	
Plaintiffs,)	
)	Case No. 21 CV 50341
v.)	
)	Judge Phillip G. Reinhard
KWAME RAOUL, in his official capacity)	
as Illinois Attorney General,)	Magistrate Judge Lisa A. Jensen
)	
Defendant.)	

NOTICE OF FILING

Please take notice that on October 29, 2021, plaintiffs, McHenry County, Illinois, and Kankakee County, Illinois, pursuant to the Court's order dated October 27, 2021, filed the attached written notices to the Federal Government (without attachments).

McHenry County, Illinois and
Kankakee County, Illinois

By: /s/ George M. Hoffman
One of their attorneys

Patrick D. Kenneally (ARDC No. 6286573)
McHenry County State's Attorney
George M. Hoffman (ARDC No. 6180738)
Jana Blake Dickson (ARDC No. 6305741)
Assistant State's Attorneys
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OFFICE OF THE STATE'S ATTORNEY
MCHENRY COUNTY
PATRICK D. KENNEALLY

September 1, 2021

Department of Justice
United States Marshals Service
Prisoner Operations Division
Detention Operations - East
Washington, D.C. 20530-0001

Dear Sir or Madam:

Re: *McHenry County, et al. v. Raoul*,
No. 21 CV 50341

Pursuant to Agreement Number 24-02-0052, between McHenry County and the United States Marshals Service, this letter gives notice that McHenry County filed the above-captioned lawsuit today. The lawsuit seeks a ruling that provisions of the recently enacted Illinois Way Forward Act, which requires the county to terminate its contract with the USMS to house immigration detainees, is unconstitutional. A copy of the complaint is enclosed.

If you have any questions or wish additional information, please do not hesitate to contact me.

Sincerely,

George M. Hoffman
Assistant State's Attorney
gmhoffman@mchenrycountyil.gov

Enclosure



OFFICE OF THE STATE'S ATTORNEY
MCHENRY COUNTY
PATRICK D. KENNEALLY

October 28, 2021

Department of Justice
United States Marshals Service
Prisoner Operations Division
Detention Operations – East
Washington, D.C. 20530-0001

Dear Sir or Madam:

Re: *McHenry County, et al., v. Raoul*,
No. 21 CV 50341

Pursuant to Agreement Number 24-02-0052, between McHenry County and the United States Marshals Service, by letter dated September 1, 2021, I provided notice of the above-captioned case to your office, along with a copy of the Complaint we filed on behalf of McHenry County and Kankakee County, challenging the Illinois Way Forward Act. I enclose a copy of the Amended Complaint filed by plaintiffs on September 15, 2021. I apologize for not having sent the Amended Complaint to you within five days after they were filed, as provided for in Agreement Number 24-02-0052.

In addition, the plaintiffs filed a motion for a preliminary injunction, to which the defendant responded and plaintiffs replied. The defendant also filed a motion to dismiss and a motion to strike, to which our responses are due tomorrow, October 29, 2021. If you wish copies of any of these filings, please let me know and I will be happy to provide them.

If you have any questions or need additional information, please give me a call.

Sincerely yours,

George M. Hoffman
Assistant State's Attorney
gmhoffman@mchenrycountyil.gov
(815) 334-4043

Enclosure



STATE'S ATTORNEY COUNTY OF KANKAKEE

189 E. COURT STREET, 6TH FLOOR • KANKAKEE, ILLINOIS 60901
(815) 936-5800 • FAX (815) 936-5802

James Rowe
State's Attorney

October 29, 2021

Department of Justice
United States Marshals Service
Prisoner Operations Division
Detention Operations – East
Washington D.C. 20530-0001

Re: McHenry County, et al. v. Raoul
Case No. 21 CV 50341

Dear Sir or Madam:

Pursuant to Agreement Number 26-05-0022 between Kankakee County and the United States Marshals Service, this letter gives notice that Kankakee County has joined with McHenry County in the above referenced lawsuit. The lawsuit seeks a ruling that provisions of the recently enacted Illinois Way Forward Act, which requires the county to terminate its contract with the USMS to house immigration detainees, is unconstitutional. A copy of the complaint and amended complaint is enclosed.

Pursuant to Kankakee County Resolution Number 2021-09-01-295 and under the authority of 55 ILCS 5/4-2003(b), Mr. Patrick Kenneally and his office have been appointed as special prosecutors on behalf of Kankakee County. If you need any additional information please contact the McHenry County State's Attorney's Office at (815) 334-4159.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Goudie", is written over the word "Sincerely,".

Theresa Goudie
Assistant State's Attorney
Kankakee County

Enc.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of **Notice of Filing** was served on

Christopher G. Wells
Kathryn Hunt Muse
Alex Hemmer
Eileen Boyle Perich
Office of the Illinois Attorney General
100 W. Randolph St.
Chicago, IL 60601

by electronic filing via the ECF system, before the hour of 4:00 p.m., on October 29, 2021.

/s/ George M. Hoffman